

## Torrence, Rufus

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**From:** Torrence, Rufus  
**Sent:** Wednesday, February 01, 2012 8:24 AM  
**To:** Dennis Brunson  
**Subject:** AFIN 26-00145 AR0033880 City of Hot Springs 2011 Annual Report  
**Attachments:** HTSP Inf-Eff Chart.doc



February 1, 2012

Dennis R. Brunson, Pretreatment Coordinator  
City of Hot Springs  
P. O. Box 700  
Hot Springs, Arkansas 71901

Re: City of Hot Springs 2011 Annual Pretreatment Report  
(Permit No. AR0033880 AFIN 26-00145 & AR0050148 AFIN 26-00444)

Dear Mr. Brunson:

The Department has reviewed the City's 2011 Annual Pretreatment Report and the report is complete. However, the Department has a requirement for future reports.

Effective September 6, 2011, the Hot Springs Board passed Ordinance #5837 which voided the MAHCs (Local Limits) shown in section 9-3-43.4 of the city codes. The City listed these "voided" MAHCs on the influent-effluent chart submitted with the 2011 annual report. The current Section 9-3-43.4 allows the City to update the local limits from time to time as necessary to protect the POTW. The City must list current MAHCs and the water quality standards (WQS). The City may use the MAHCs (based on current WQS) developed by the Department. For the City's convenience, the Department has attached an influent-effluent chart with the current MAHCs and WQS approved by the Department.

The Department will not contest the City's decision to determine that Ryan Steak House, Kleen Linen, Hot Springs Meat Packing, St. Joseph Mercy Center and National Park Medical Center are not Significant Industrial Users. The City has agreed to continue to permit, sample and inspect these Non-Significant Industrial Users and to enforce all applicable pretreatment codes.

The Department appreciates the City's continued efforts in annual reporting. If you have any questions or concerns, please contact the Department at (501) 682-0626 or by email at [torrence@adeq.state.ar.us](mailto:torrence@adeq.state.ar.us).

Sincerely,



Rufus Torrence, Pretreatment Engineer  
Water Division

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY  
5301 NORTHSHORE DRIVE / NORTH LITTLE ROCK / ARKANSAS 72118-5317 / TELEPHONE 501-682-0744 / FAX 501-682-0881  
[www.adeq.state.ar.us](http://www.adeq.state.ar.us)

**MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT**

REPORTING YEAR: 20 TO 20  
 TREATMENT PLANT: City of Hot Springs NPDES PERMIT #AR0033880  
 AVERAGE POTW FLOW: MGD % IU FLOW: %

METALS, CYANIDE and PHENOLS	MAHC (Total) (µg/l) (2)	INFLUENT DATES SAMPLED (µg/l) Once/quarter				WQ level/ limit (µg/l) (2)	EFFLUENT DATES SAMPLED (µg/l) Once/quarter				LABORATORY ANALYSIS		
		Date	Date	Date	Date		Date	Date	Date	EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)	
Antimony	N/A					N/A					60		
Cadmium	8.96					3.65					0.5		
Copper	131.11					24.91					0.5		
Lead	11.59					4.52					0.5		
Mercury	0.06					0.02					.005		
Nickel	70.63					371.64					0.5		
Selenium	14.13					9.61					5		
Silver	6.2					1.55					0.5		
Zinc	688.68					241.04					20		
Chromium	258.41					554.92					10		
Cyanide	32.25					10.00					10		
Arsenic	11.77					576.72					0.5		
Molybdenum	10.59					N/A					--		
Phenols	N/A					N/A					5		
Beryllium	20.38					10.19					0.5		
Thallium	N/A					N/A					0.5		
Flow, MGD	N/A					N/A							
(3)													

(1) It is advised that the influent and effluent samples are collected considering flow detention time through each plant. **Analytical MQLs must be met for the effluent (and SHOULD be met for the influent) so the data can also be used for Local Limits assessment and NPDES application purposes.**

(2) This value was calculated during the development of TBLL based on State WQ criteria, EPA guidance and either ADEQ Pretreatment staff Excel spreadsheets or the Permittee's consultant with concurrence from Pretreatment staff.

(3) Record the name of any pollutant [40 CFR 122, Appendix D, Table II and/or Table V] detected and the concentration at which they were detected.

MAHL - Maximum Allowable Headworks Level / MAHC – Maximum Allowable Headworks Concentration

WQ - "Water Quality Levels not to exceed" OR actual permit limit.

BH17D



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RECEIVED  
JAN 27 2012  
By JH

City of Hot Springs  
Municipal Utilities  
WWTP  
320 Davidson Drive  
Hot Springs, AR 71902  
501-262-1881  
501-262-0339 fax

January 24, 2012

Arkansas Department of Environmental Quality  
Attn: Rufus Torrence  
5301 Northshore Drive  
Little Rock, AR 72118-5317

Re: Pretreatment Performance Summary (PPS)

Dear Mr. Torrence,

Please find enclosed the City of Hot Springs Municipal Utilities' 2011 performance summary. ✓

Please note that the flow discharge, first, second, third and fourth quarter low level Hg results and collection dates are highlighted in red on the report. These samples were collected at different times from our regular table III results. *OK*

Ryan's Family Steak House, Craighead Cleaners, Inc., Hot Springs Packing Co., National Park Medical Center and St. Joseph Mercy Center have been removed from our permitted significant industrial user's list as per the audit review recommendation. These industries are now classified as permitted non-significant industrial users. *OK*

If you have any questions, comments and/or need additional information, please let me know. ✓

Sincerely,  
*Dennis R. Brunson*  
Dennis R. Brunson  
Pretreatment Coordinator

Enclosure

C: Ron Wacaster, Facilities Operations Manager  
Richard Penn, Utilities Director  
Steve Mallett, Deputy City Manager

- ① inf-eff logged
- ② ICIS coded
- ③ IUs checked
- ④ Annual Report Form Updated

MONITORING RESULTS F  
 REPORTING YEAR: 1 Jan 11 thru 31 Dec 11 TREATMENT PLANT: City of Hot Springs Municipal Utilities  
 AVERAGE POTW FLOW: 11.05 MGD % IU FLOW: 1.00% NPDES PERMIT: AROOC33860  
 DETECTION LEVEL ACHIEVED

Metals, Cyanide and Phenols	MAHL mg/l	Influent Dates Sampled				WQ level/limit mg/l	Effluent Dates Sampled				EPA MCL ug/l	Laboratory Analysis (See Attachment PPS) EPA METHOD USED	DETECTION LEVEL ACHIEVED	
		3/6/2011 ug/l	5/15/2011 ug/l	8/7/2011 ug/l	10/30/2011 ug/l		3/6/2011 ug/l	5/15/2011 ug/l	8/7/2011 ug/l	10/30/2011 ug/l				
T Antimony	N/A	0	0	0	0	N/A	0	0	0	0	60	EPA 200.8	60 ug/l	
T Arsenic	1.11	0.75	0.96	0.56	0	N/A	0	0	0	0	0.5	EPA 200.8	0.5 ug/l	
T Beryllium	N/A	0	0	0	0	N/A	0	0	0	0	0.5	EPA 200.8	0.5 ug/l	
T Cadmium	0.59	0	0	1.3	0	0.023	0	0	0.64	0	0.5	EPA 200.8	0.5 ug/l	
T Chromium	17.43	10	13	0	0	8.18	0	0	0	0	10	EPA 200.8	10 ug/l	
T Copper	16.66	51	69	72	34	0.45	2	4.1	5.4	4.5	0.5	EPA 200.8	0.5 ug/l	
T Lead	2.53	8.1	8.8	4.5	2.5	0.034	0.89	0	0	0	0.5	EPA 200.8	0.5 ug/l	
T Mercury	0.037	68 ng/l	83 ng/l	560 ng/l	20 ng/l	0.0005	26 ng/l	36 ng/l	0 ng/l	9.8 ng/l	0.005	EPA 245.7	1.8 ng/l	
T Molybdenum	N/A	3/15/2011 N/A	6/8/2011 N/A	8/16/2011 N/A	11/1/2011 N/A	N/A	8/16/2011 N/A	6/8/2011 N/A	8/16/2011 N/A	11/1/2011 N/A	N/A	EPA 200.8	N/A	
T Nickel	10.07	5.9	17	4.6	4.6	0.78	2.2	3	3.4	2.8	0.5	EPA 200.8	0.5 ug/l	
T Selenium	N/A	0	0	0	0	N/A	0	0	0	0	5	EPA 200.8	5 ug/l	
T Silver	0.47	1	1.8	1.9	0	0.006	0	0	0	0	0.5	EPA 200.8	0.5 ug/l	
T Thallium	N/A	0	0	0	0	N/A	0	0	0	0	0.5	EPA 200.8	0.5 ug/l	
T Zinc	34.08	90	180	140	97	34	34	0	22	22	20	EPA 200.8	20 ug/l	
T Cyanide	2.45	0	0	0	0	0.07	0	0	0	0	10	EPA 336.2	10 ug/l	
T Phenols	N/A	0.11	0.029	0.016	0.032	N/A	0.01	0	0	0.011	5	EPA 420.1	5 ug/l	
Flow, MGD		11.54	9.07	7.53	7.71		10.76	10.91	7.3	7.1				
Flow, MGD Low Level Hg		9.07	8.4	5.01	7.39		10.31	8.33	8.24	7.12				
Bis(2-ethylhexyl)phthalate		2/27/2011		22 ug/l									EPA 625	10 ug/l
Phenol		2/27/2011		17 ug/l									EPA 625	10 ug/l
1,3 Dichlorobenzene		2/27/2011		57 ug/l									EPA 624	10 ug/l
1,4 Dichlorobenzene		2/27/2011		57 ug/l									EPA 624	10 ug/l
Toluene		2/27/2011		97 ug/l									EPA 608	0.01 ug/l
Aldrin		2/27/2011		0.020 ug/l									EPA 608	0.05 ug/l
Beta-BHC		2/27/2011		0.018 ug/l									EPA 608	0.07 ug/l
Chlorpyrifos		2/27/2011		0.20 ug/l									EPA 608	0.02 ug/l
4,4'-DDT		2/27/2011		0.064 ug/l									EPA 608	0.02 ug/l
Endrin		2/27/2011		0.022 ug/l									EPA 608	0.01 ug/l
Heptachlor		2/27/2011		0.21 ug/l									EPA 608	0.01 ug/l
Heptachlor epoxide		2/27/2011		0.012 ug/l									EPA 608	0.01 ug/l

"Voiced"

Attachment A

UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

Industrial User	SIC Code	Categorical Determination	Control Documents				Compliance Status				Effluent Limits	
			Y/N	Last Action	New User	Number of Times Inspected	Number of Times Sampled	BMR	90-Day Comp	Semi Annual		Self Monitoring
Mid-America Distillations, Inc.	2869	Categorical	Yes	3/2/2011	No	2	12	0	0	0	13	Compliant
Triumph Fabrications Hot Springs	3471-02	Categorical	Yes	7/2/2008	No	2	8	0	0	0	111	Compliant
Alliance Rubber Co.	3069-02	Noncategorical	Yes	3/2/2008	No	2	6	0	0	0	34	Compliant
Triumph Airborne Structures, Inc.	3471-02	Categorical	Yes	8/2/2008	No	2	3	0	0	0	30	Compliant

# Attachment 'C'

## Pretreatment Performance Summary (PPS)

NOTE: ALL QUESTIONS REFER TO THE INDUSTRIAL PRETREATMENT PROGRAM AS APPROVED BY THE EPA. THE PERMITTEE SHOULD NOT ANSWER THE QUESTIONS BASED ON CHANGES MADE TO THE APPROVED PROGRAM WITHOUT EPA AUTHORIZATION.

### I. General Information

Control Authority Name: Hot Springs Municipal Utilities

Address: 320 Davidson Dr.

City: Hot Springs State: AR Zip: 71901

Contact Person: Dennis R. Brunson Title: Pretreatment Coordinator

Contact Telephone: 501-262-1881 Ext 15

NPDES Permit No: AR0033880

Reporting Period: January 1, 2011 December 31, 2011  
(Beginning month and year) (Ending month and year)

Total Number of Categorical IUs: 3

Total Number of Noncategorical IUs: 1

### II. Significant Industrial User Compliance

#### SIGNIFICANT INDUSTRIAL USERS

	<u>Categorical</u>	<u>Noncategorical</u>
1. No. of SIUs Submitting BMRS/Total No Required.....	<u>0/0</u>	<u>N/A</u>
2. No. of SIUs Submitting 90 day Compliance Reports/ No. Required...	<u>0/0</u>	<u>N/A</u>
3. No. of SIUs Submitting Semi-annual Reports/Total No. Required.....	<u>0/0</u>	<u>0/0</u>
4. No. of SIUs Meeting Compliance Schedule/Total No. Required to Meet Schedule.....	<u>0/0</u>	<u>0/0</u>



SIU Compliance (cont.)

	<u>Categorical</u>	<u>Noncategorical</u>
5. No. of SIUs in Significant Noncompliance/Total No. of SIUs....	<u>0/0</u>	<u>0/0</u>
6. Rate of Significant Noncompliance For all SIUs Categorical and Noncategorical.....	<u>0/0</u>	

III. Compliance Monitoring Program

1. No. of Control Documents Issued/ Total No. Required.....	<u>3</u>	<u>1</u>
2. No. of Nonsampling Inspections Conducted.....	<u>6</u>	<u>2</u>
3. No. of Sampling Visit Conducted.....	<u>23</u>	<u>6</u>
4. No. of Facilities Inspected Nonsampling.....	<u>3</u>	<u>1</u>
5. No. of Facilities Sampled.....	<u>3</u>	<u>1</u>

IV. Enforcement Actions

SIGNIFICANT INDUSTRIAL USERS

	<u>Categorical</u>	<u>Noncategorical</u>
1. No. of Compliance Schedules Issued/No. Of Schedules Required....	<u>0</u>	<u>0</u>
2. No. of Notices of Violations Issued to SIUs.....	<u>0</u>	<u>0</u>
3. No. of Administrative Orders Issued to SIUs.....	<u>0</u>	<u>0</u>
4. No of Civil Suits Filed.....	<u>0</u>	<u>0</u>
5. No. of Criminal Suits Filed.....	<u>0</u>	<u>0</u>

	<u>Categorical</u>	<u>Noncategorical</u>
6. No. of Significant Violators (Attach newspaper publication).....	<u>0</u>	<u>0</u>
7. Amount of Penalties Collected (total dollars IUs assessed).....	<u>0</u>	<u>0</u>
8. Other Actions (sewer bans, etc).....	<u>0</u>	<u>0</u>

THE FOLLOWING CERTIFICATION MUST BE SIGNED IN ORDER FOR THIS FORM TO BE CONSIDERED COMPLETE:

I CERTIFY THAT THE INFORMATION CONTAINED HEREIN IS COMPLETE AND ACCURATE TO THE BEST OF MY KNOWLEDGE.

Authorized Representative: Dennis T. Benson  
 Title: Pre-treatment Coordinator Date: 2-4 Jan 12

Report Type

- Biosolids Program Report
- CAFO Annual Report
- CSO Event Report
- Local Limits Report
- MS4 Program Report
- Pretreatment Performance Summary Report
- SSO Annual Report
- SSO Event Report
- SSO Monthly Event Report
- Storm Water Event Report

Report Information

\* Pretreatment Performance Summary Start Date: 01/01/2011

Date of Most Recent Technical Evaluation & of Local Limits:

Date of Most Recent Adoption of Technically Based Local Limits:

Local Limit Pollutants:

**ADD / REMOVE**

**Significant Industrial Users (SIUs)**

SIUs:

SIUs Without Control Mechanism:

SIUs Not Inspected:

SIUs Not Sampled:

SIUs in SNC with Pretreatment Standards:

SIUs in SNC with Reporting Requirements:

SIUs in SNC with Pretreatment Schedule:

SIUs in SNC Published in Newspaper:

SIUs Schedules:

Violation Notices Issued to SIUs:

Administrative Orders Issued to SIUs:

Civil Suits Filed Against SIUs:

Criminal Suits Filed Against SIUs:

**Removal Credits**

Removal Credits Application Status:  Not Applicable

Date of Most Recent Removal Credits Approval:

Removal Credits:

**ADD / REMOVE**

**Categorical Industrial Users (CIUs)**

CIUs:

CIUs in SNC:

**Acceptance of Waste**

Acceptance of Hazardous Waste:  No

Acceptance of Non-Hazardous Industrial Waste:  No

Acceptance of Hauled Domestic Wastes:  No

**Penalties**

Dollar Amount of Penalties Collected: \$

Industrial Users (IUs) from which Penalties have been collected:

**Deficiencies**

Deficiencies Identified During IU File Review:  No

Control Mechanism Deficiencies:  No

Legal Authority Deficiencies:  No

Deficiencies in Data Management and Public Participation:  No

Deficiencies in Interpretation and Application of Pretreatment Standards:  No

Inadequacy of Sampling and Inspections:  No

Adequacy of Pretreatment Resources:  Yes

**Other Information**

SUC Reference:

SUC Date:

Annual Pretreatment Budget: \$

Pass-Through/Interference Indicator:

Violation of IU Schedule for Remedial Measures:  No

Response to Violation of IU Schedule for Remedial Measures:

**Annual Frequency**

Annual Frequency of Influent Toxicant Sampling:

Annual Frequency of Effluent Toxicant Sampling:

Annual Frequency of Sludge Toxicant Sampling: